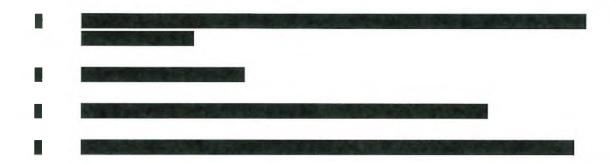
## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT GREENEVILLE

B.P., H.A., and S.H., individually, and on behalf of all others similarly situated, )	
Plaintiffs,	
vs.	No. 2:23-cv-71
CITY OF JOHNSON CITY, TENNESSEE, a governmental entity,  KARL TURNER, individually and in his official capacity as Chief of the Johnson City Police Department,  KEVIN PETERS, individually and in his official capacity as Captain of the Johnson City Police Department,  TOMA SPARKS, individually and in his official capacity as Investigator of the Johnson City Police Department,  JUSTIN JENKINS, individually and in his official capacity as Investigator of the Johnson City Police Department,  JEFF LEGAULT, individually and in his official capacity as Investigator of the Johnson City Police Department,  JEFF LEGAULT, individually and in his official capacity as Investigator of the Johnson City Police Department,	Judge McDonough  Magistrate Judge McCook  JURY TRIAL DEMAND
BRADY HIGGINS, individually and in his ) official capacity as Investigator of the Johnson City Police Department, and )	
DOES 8-20, inclusive, ) Defendants. )	
Defendants.	

INVESTIGATOR TOMA SPARKS' RESPONSES TO PLAINTIFFS' SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS



3. Identify all YOUR sources of income since January 1, 2018, including the annual amount of each source as reported on tax returns.

**RESPONSE:** Objection. This request is not reasonably calculated to lead to the discovery of relevant information and is overly broad and unduly burdensome. Without waiving said objection, Defendant Sparks identifies the following sources of employment income from his wife and himself. **ATTORNEY-EYES ONLY DESIGNATION** as to employment income information disclosed relating to Defendant Sparks' wife, C. Sparks.

T. Spa	rks-City of Johnson City	C. Sparks-
2018	\$41,040.09	
2019	\$44, 581,.08	
2020	\$45,993.36	
2021	\$47,898.95	
2022	\$55,878.23	
2023	\$60,323.04	September 1

4. Identify all accounting firms used to prepare YOUR tax returns since January 1, 2018, including the name and address of each firm.

**RESPONSE:** None

## **VERIFICATION**

Pursuant to Fed. R. Civ. P. 33(b)(3) and (5), the undersigned, Toma Sparks, makes oath that the foregoing responses to interrogatories are true and correct to the best of his knowledge and belief. I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

Executed on April 24, 2024.

TOMA SPARKS

## Respectfully submitted,

/s/Kristin E. Berexa

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Counsel for Toma Sparks in his individual capacity

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this the 25<sup>th</sup> day of April, 2024, a true and correct copy of the foregoing has been forwarded via Email and/ or US Mail:

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/s/ Kristin E. Berexa Kristin E. Berexa